

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Title V Draft Permit Renewal No. V-04-006

QUIK-PIK, INC.

GEORGETOWN, KENTUCKY

March 10, 2004

WILSON TAN, REVIEWER

Plant I.D. # 21-209-00024

Application Log # 55801

**SOURCE DESCRIPTION:**

Quik-Pik, Inc., an existing Title V major source, submitted applications for a permit renewal and minor permit revision to its existing V-98-027 (Revision 1) permit.

This company paints metal frames which are alkaline cleaned, phosphatized, rinsed and dried prior to painting. The painted parts are dried in an oven. There are two automatic spray booths, two touch-up booths, a natural gas fired oven and wash tanks. All paints are applied "as received" from the paint vendor.

**COMMENTS:**

**V-04-006:**

- a. For PSD applicability purposes, Quik-Pik, Inc. is a 250 tons/year Volatile Organic Compound (VOC) major source.
- b. The facility accepted the previous self-imposed plant-wide limit of 330 tons/yr VOC emissions.
- c. 401 KAR 59:225 does apply. However, the company is using the 3.0 lb/gal VOC exemption. To comply with this regulation, the company will use only paints that have a VOC density less than 3.0 lbs/gal.
- d. 40 CFR 63, Subpart RRRR – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture applies to emission point #2 – Automatic Paint Line because surface coating conducted uses coatings, thinners, and cleaning materials that contain organic Hazardous Air Pollutant (HAP). However, to preclude the applicability of the MACT, Quik-Pik has accepted a 9 tons/yr single HAP and 22.5 tons/yr combined HAPs emission limitations.
- e. *Emission Point #1 – 3 Stage Surface Preparation:*
  - i. Two burners rated at 2.8 mmBTU/hr and 1.0 mmBTU/hr have been removed.
  - ii. A 2 mmBTU/hr maximum rated capacity natural gas burner is used to heat the 2000 gallons phosphate tank. Previous permit wrongly listed the same burner as 1.5 mmBTU/hr.
  - iii. Additional regulation, requirements, and compliance demonstration have been added or modified to reflect the current operation.

- f. *Emission Point #2 – Automatic Paint line:*
- i. Quik-Pik, Inc. proposed to replace the existing automatic spray guns (emission point #2 – Automatic Paint Line) with more efficient automatic spray guns. Emission point #2 is an Automatic Paint Line for the spray coating of metal storage racks. The existing paint line has 2 automatic spray booths, each containing 4 automatic spray guns with spray capacity of 6 gals/hr each. The paint line also has 2 manual touch-up spray booths, each containing one manual spray gun with a capacity of 2 gals/hr each. A gas-fired forced-air drying oven is included in the paint line. Quik-Pik will replace a total of 6 existing automatic spray guns in both of the booths with 6 new automatic spray guns rated at 14 gals/hr each. Although the potential hourly usage is higher, the actual hourly and actual annual paint usage are anticipated to be lower than before due to better transfer efficiency and lower amount of rejects and reworks. Therefore these proposed changes may lower the actual VOC emissions from the facility.
  - ii. The proposed changes meet the 401 KAR 52:020 Section 18 - Section 502(b)(10) Changes criteria.
  - iii. Quik-Pik uses several different coatings and for emission calculation purposes, Quik-Pik has agreed to the creation of a generic coating that consists of all the worst-case pollutants.
  - iv. Additional regulation, requirements, and compliance demonstrations have been added or modified to reflect the current and proposed operation.
  - v. 99.5% control efficiency fabric filter is used to control PM emissions. The previous permit wrongly listed the control efficiency for the same fabric filter as 99%.
- g. Eight 150,000 mmBTU/hr and ten 220,000 mmBTU/hr natural gas heaters have been added to the Insignificant Activities list.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.